

UNITED STATES BANKRUPTCY COURT
Eastern DISTRICT OF Michigan

IN RE City of Detroit, MI

Debtor.

BAP No. 22-12150

Debra Metris-Shamoon, et al

Appellant,

Bankr. No. 13-53846
Adv. No. _____
Chapter 9

v.

City of Detroit, MI

Appellee.

Statement of Issues to Be Presented

Debra Metris-Shamoon, pursuant to Federal Rule of Bankruptcy Procedure

8009(a), hereby states the issues to be presented on appeal:

The bankruptcy court erred when it:

1. Did the bankruptcy court err as a matter of law by rejecting Respondents'
equitable arguments of laches and estoppel in response to the
debtor City's motion for the entry of an order enforcing the bar date?
2. Did the bankruptcy court err in concluding that the Respondents' were
unknown creditors whose claims were not "readily ascertainable" such that
Respondents were entitled to only constructive notice of the City's bankruptcy?
3. _____

4.

5.

Dated: 09/22/2022

/s/Michael R. Dezsi (P64530)

Signature

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File with the Bankruptcy Court

Note: Attach proof of service on all parties. Fed. R. Bankr. P. 8011(d)(1)(B).